

SCANNED

DATE: 06/16/04 UNITED STATES DISTRICT COURT
FOR THE
BY: K.Y. DISTRICT OF MASSACHUSETTS

ELAINE L. CHAO, Secretary of Labor,
United States Department of Labor

Plaintiff

v.

CAVALIER SECURITY AND
PATROL, INC., FRANCOIS YOUHANNA,
TONY YOUHANNA, and HANNA
YOUHANNA

Defendants

CIVIL ACTION NO.:
04-10029 RCL

ANSWER

The Defendants, Cavalier Security and Patrol, Inc., Francois Youhanna, Tony Youhanna and Hanna Youhanna (collectively hereinafter referred to as the Defendants)

Answers as follows:

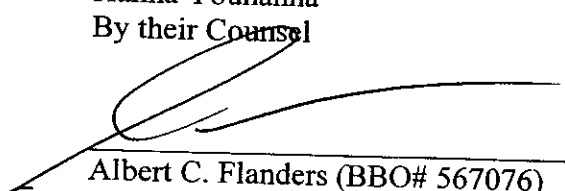
- I. Paragraph I contains no allegations against the Defendants, as such the Defendants are not required to admit or deny the statements contained therein.
- II. Defendants admit the allegations contained in Paragraph II.
- III. Defendants admit the allegations contained in Paragraph III.
- IV. Defendants admit the allegations contained in Paragraph IV.
- V. Defendants admit the allegations contained in Paragraph V.
- VI. Defendants admit the allegations contained in Paragraph VI to the extent that the reference to "section 3(r) of the Act" means section 3(r)(1), Defendants

deny any and all implied meanings or references to section 3(r) which are not intended or which do not relate to section 3(r)(1).

- VII. Defendants deny the allegations contained in Paragraph VII.
- VIII. Defendants deny the allegations contained in Paragraph VIII.
- IX. Defendants deny the allegations contained in Paragraph IX.
- X. Defendants deny the allegations contained in Paragraph X.
- XI. Defendants deny the allegations contained in Paragraph XI.

DEFENDANTS DEMAND A JURY TRIAL.

Defendants:
Cavalier Security and Patrol, Inc.
Francois Youhanna
Tony Youhanna
Hanna Youhanna
By their Counsel



Albert C. Flanders (BBO# 567076)
Pollack & Flanders, LLP
50 Congress Street
Suite 430
Boston, Massachusetts 02109
(617) 723-8544
Fax (617) 589-0789